UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

BCS SOFTWARE, LLC, Plaintiff v. **SAMSUNG ELECTRONICS AMERICA, INC.,** Defendant	**Case No. 6:19-cv-00235** **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff BCS Software, LLC ("Plaintiff" or "BCS") hereby asserts the following claims for patent infringement against Samsung Electronics America, Inc. ("Defendant or "Samsung"), and alleges, on information and belief, as follows:

THE PARTIES

1. BCS Software, LLC is a limited liability company organized and existing under the laws of the Texas with its principal place of business in Austin, Texas.

2. Samsung Electronics America, Inc. New York corporation having a principal place of business at 85 Challenger Road, Ridgefield Park, New Jersey 07660.

JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq*. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

4. Samsung has committed acts of infringement in this judicial district.

5. On information and belief, Samsung has a regular and established place of business in this judicial district at 12100 Samsung Blvd, Austin, Texas 78754.

6. On information and belief, the Court has personal jurisdiction over Samsung because Samsung has committed, and continues to commit, acts of infringement in the state of Texas, has conducted business in the state of Texas, and/or has engaged in continuous and systematic activities in the state of Texas.

7. On information and belief, Samsung's instrumentalities that are alleged herein to infringe were and continue to be used, imported, offered for sale, and/or sold in the Western District of Texas.

8. Venue is proper in the Western District of Texas pursuant to 28 U.S.C. § 1400(b).

U.S. PATENT NO. 7,890,809

9. BCS is the owner, by assignment, of U.S. Patent No. 7,890,809 ("the '809 Patent"), entitled HIGH LEVEL OPERATIONAL SUPPORT SYSTEM, which issued on February 15, 2011. A copy of the '809 Patent is attached as **Exhibit A**.

10. The '809 Patent is valid, enforceable, and was duly issued in full compliance with Title 35 of the United States Code.

11. The '809 Patent was invented by Messrs. Blaine Nye and David Sze Hong.

12. The priority date for the '809 Patent is at least May 1, 2003.

13. The expiration date of the '809 Patent is August 21, 2023.

14. The '809 Patent has been referenced by 18 United States Patents, United States Patent Applications and foreign patents.

15. The '809 Patent was examined by United States Patent Examiner Joshua Lohn.

During the examination of the ’809 Patent, the United States Patent Examiner searched for prior art in the following US Classifications: 714/38, 714/47, 719/320.

16. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent No. 6,748,555 to Teegan et al as one of the most relevant prior art references found during the search.

17. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent No. 6,862,698 to Shyu as one of the most relevant prior art references found during the search.

18. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent No. 7,003,560 to Mullen et al as one of the most relevant prior art references found during the search.

19. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent No. 7,100,195 to Underwood as one of the most relevant prior art references found during the search.

20. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent Application No. 2003/0037288 by Harper et al as one of the most relevant prior art references found during the search.

21. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent Application No. 2003/0204791 by Helgren et al as one of the most relevant prior art references found during the search.

22. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent Application No. 2004/0073566 by Trivedi as one of the most relevant prior art references found during the search.

23. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent Application No. 2004/0088401 by Tripathi et al as one of the most relevant prior art references found during the search.

24. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent Application No. 2005/0044535 by Coppert as one of the most relevant prior art references found during the search.

25. After conducting a search for prior art during the examination of the ’809 Patent, the United States Patent Examiner identified and cited U.S. Patent Application No. 6,748,555 by Shyu as one of the most relevant prior art references found during the search.

26. The ’809 Patent relates to:

> A high level Operational Support System (OSS) framework provides the infrastructure and analytical system to enable all applications and systems to be managed dynamically at runtime regardless of platform or programming technology. Applications are automatically discovered and managed. Java applications have the additional advantage of auto-inspection (through reflection) to determine their manageability. Resources belonging to application instances are associated and managed with that application instance. This provides operators the ability to not only manage an application, but its distributed components as well. They are presented as belonging to a single application instance node that can be monitored, analyzed, and managed. The OSS framework provides the platform-independent infrastructure that heterogeneous applications require to be monitored, controlled, analyzed and managed at runtime. New and legacy applications written in C++ or Java are viewed and manipulated identically with zero coupling between the applications themselves and the tools that scrutinize them.

’809 Patent (Abstract).

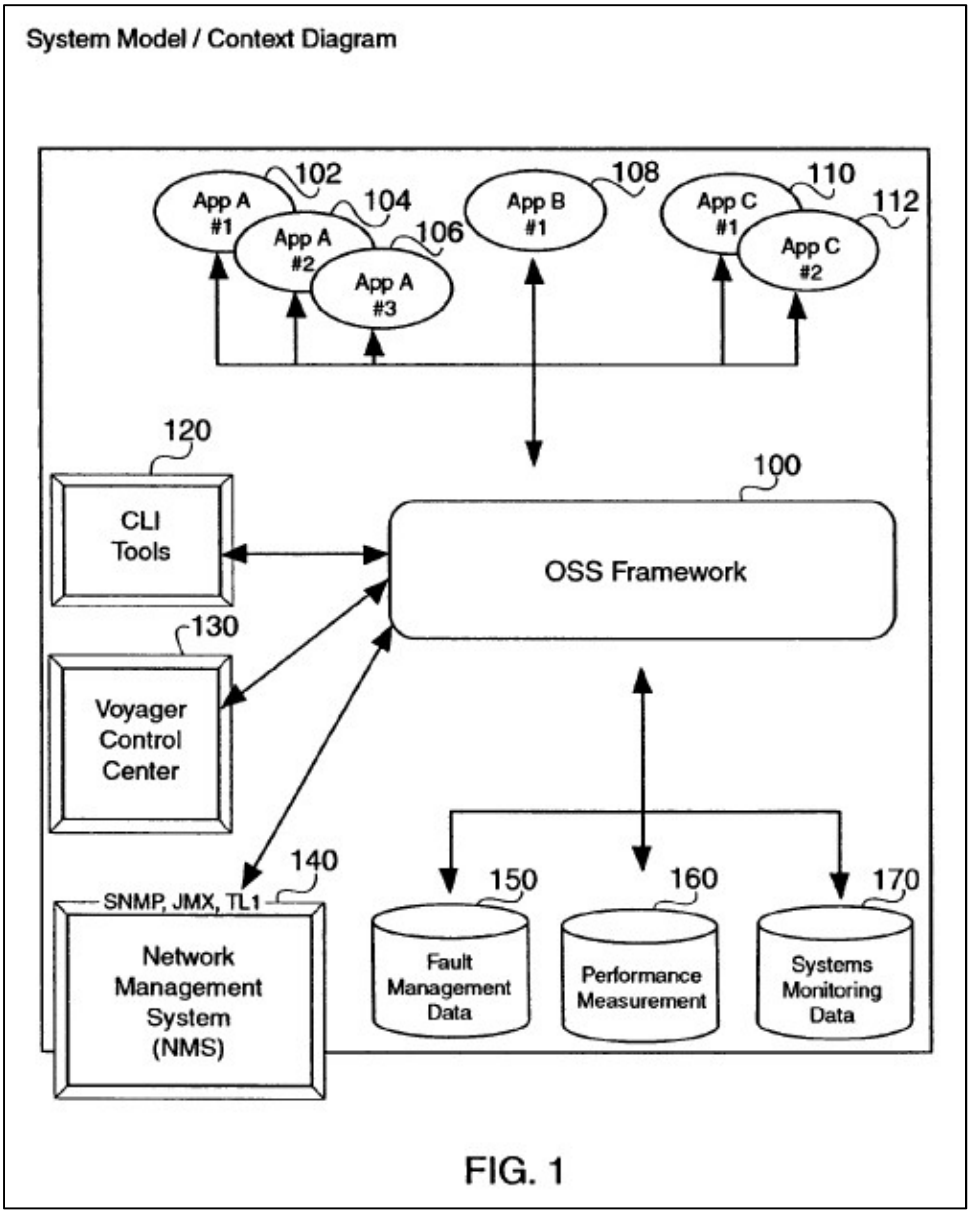


FIG. 1

Id. (Figure 1).

27. The field of the invention is to improvements in "wireless communication carriers. More particularly, it relates to operational support system (OSS), application/systems management, and network management." *Id.*, col. 1:17-20.

28. As disclosed in the '809 Patent, "[m]any network management technologies exist that allow operators to manage applications and devices at runtime. For instance, SNMP, TL1 and JMX

each attempt to provide operators with the ability to manipulate and affect change at runtime." *Id*., col. 1:22-26.

29. As disclosed in the '809 Patent, "[t]he fundamental of each is similar. It is to manipulate the objects of an application through messaging." *Id*., col. 1:26-27.

30. As disclosed in the '809 Patent, "SNMP is the standard basic management service for networks that operate in TCP/IP environments. It is intended primarily to operate well-defined devices easily and does so quite successfully. However, it is limited to the querying and updating of variables." *Id*., col. 1:28-32.

31. As disclosed in the '809 Patent, "Transaction Language 1 (TL1) is a set of ASCII-based instructions, or 'messages,' that an operations support system (OSS) uses to manage a network element (NE) and its resources. *Id*., col. 1:32-35.

32. As disclosed in the '809 Patent, "JMX is a Java centric technology that permits the total management of objects: not only the manipulation of fields, but also the execution of object operations. It is designed to take advantage of the Java language to allow for the discovery and manipulation of new or legacy applications or devices." *Id*., col. 1:35-40.

33. As disclosed in the '809 Patent, "Operational Support for enterprise applications is currently realized using a variety of technologies and distinct, separate services. For instance, network management protocols (SNMP, JMX, TL1, etc.) provide runtime configuration and some provide operation invocation, but these technologies are not necessarily geared toward applications." *Id*., col. 1:40-45.

34. As disclosed in the '809 Patent, "[s]ome are language specific (e.g., JMX) and require language agnostic bridging mechanisms that must be implemented, configured and maintained.

SNMP is generic (e.g., TL1 and SNMP) and very simple in nature, but it requires application developers to implement solutions to common OSS tasks on top of SNMP. *Id*., col. 1:46-51.

35. As disclosed in the ’809 Patent, “TL1 is also ASCII based and generic. However, while it is very flexible and powerful, it is another language that must be mastered, and it's nature is command line based. As a result, it is not intuitively based in presentation layer tools. While all the technologies have their respective benefits, they do not provide direct means of providing higher level OSS functionality. Conventionally, applications are monitored, analyzed and managed at runtime.” *Id*., col. 1:52-59.

36. As disclosed in the ’809 Patent, one or more claims “provid[e] a high level operational support system framework comprises monitoring a health of a plurality of applications. The health of the plurality of applications is assessed, and the health of the plurality of applications is analyzed, whereby each of the plurality of applications are managed dynamically at runtime regardless of a platform of each of the plurality of applications.” *Id*., col. 1:64–2:3.

37. Consequently, the ’809 Patent improves the computer functionality itself and represents a technological improvement to the operation of computers.

SAMSUNG PRODUCTS

38. Upon information and belief, Samsung makes, uses, imports, sells, and/or offers for sale Samsung SyncThru software products (“**SyncThru**”), which is described by the Samsung website (www.samsung.com). and is exemplified by the following references:

- “SAMSUNG | Printer Solutions” (“**ST1**”), available at https://www.samsung.com/us/printersolutions/device_print_mgmt.html (last accessed April 1, 2019);
- “Samsung. Printing Innovation” (“**ST2**”), *available at* https://www.samsung.com/us/printersolutions/docs/PNT-Solutions-SyncThru6-Sales-Guide-9-2013.pdf (last accessed April 1, 2019);

- "SyncThru Admin6 – 1.Installation" ("**ST3**"), *available at* https://www.youtube.com/watch?v=S4j4Scd9UDw (last accessed April 1, 2019);
- "Samsung Universal Print Driver 2 – User's Guide" ("**ST4**"), *available at* http://downloadcenter.samsung.com/content/UM/201304/20130423145353550/EN/UPD2_Guide_English.pdf (last accessed April 1, 2019);
- "SyncThru Web Admin Service Administrator Manual" ("**ST5**"), *available at* http://www.electis.co.il/files/Applications/SWAS%204.x/SWAS_main.pdf (last accessed April 1, 2019);
- "Installing the driver locally" ("**ST6**"), *available at* http://downloadcenter.samsung.com/content/UM/201502/20150210172429741/EN/english/english/manual/CHDEICGB.htm?isTocLink=opened (last accessed April 1, 2019);
- "Using SyncThru Web Service" ("**ST7**"), available at http://www.samsungsetup.com/ts/manual/samsung%20c1810%20series/english/manual/CHDIBFBI.htm (last accessed April 1, 2019);

39. The information contained in References **ST1-ST7** is incorporated by reference as if set forth fully herein.

40. The information contained in reference **ST1** accurately describes the operation and functionality of the SyncThru software product.

41. The information contained in reference **ST2** accurately describes the operation and functionality of the SyncThru software product.

42. The information contained in reference **ST3** accurately describes the operation and functionality of the SyncThru software product.

43. The information contained in reference **ST4** accurately describes the operation and functionality of the SyncThru software product.

44. The information contained in reference **ST5** accurately describes the operation and functionality of the SyncThru software product.

45. The information contained in reference **ST6** accurately describes the operation and functionality of the SyncThru software product.

46. The information contained in reference **ST7** accurately describes the operation and functionality of the SyncThru software product.

COUNT I
(Infringement of U.S. Patent No. 7,890,809)

47. BCS incorporates paragraphs 1-37 herein by reference.

48. Samsung has been on notice of the ’809 Patent at least as early as the date it received service of this complaint.

49. Upon information and belief, Samsung has infringed and continues to infringe one or more claims, including Claim 1, of the ’809 Patent by making, using, importing, selling, and/or, offering for sale the SyncThru software product.

50. Samsung, with knowledge of the ’809 Patent, infringes the ’809 Patent by inducing others to infringe the ’706 Patent. In particular, Samsung intends to induce its customers to infringe the ’809 Patent by encouraging its customers to use the SyncThru software product.

51. Samsung also induces others, including its customers, to infringe the ’809 Patent by providing technical support for the use of the SyncThru software product.

52. Upon information and belief, at all times Samsung owns and controls the operation of the SyncThru software product in accordance with an end user license agreement.

53. Claim 1 of the ’809 Patent recites:

> 1. A method of providing a high level support framework, comprising:
>
> monitoring from a physical server a health of a plurality of client applications and a health of said plurality of client applications' distributed components, using a common monitoring protocol, said monitoring being independent of a programming technology of said plurality

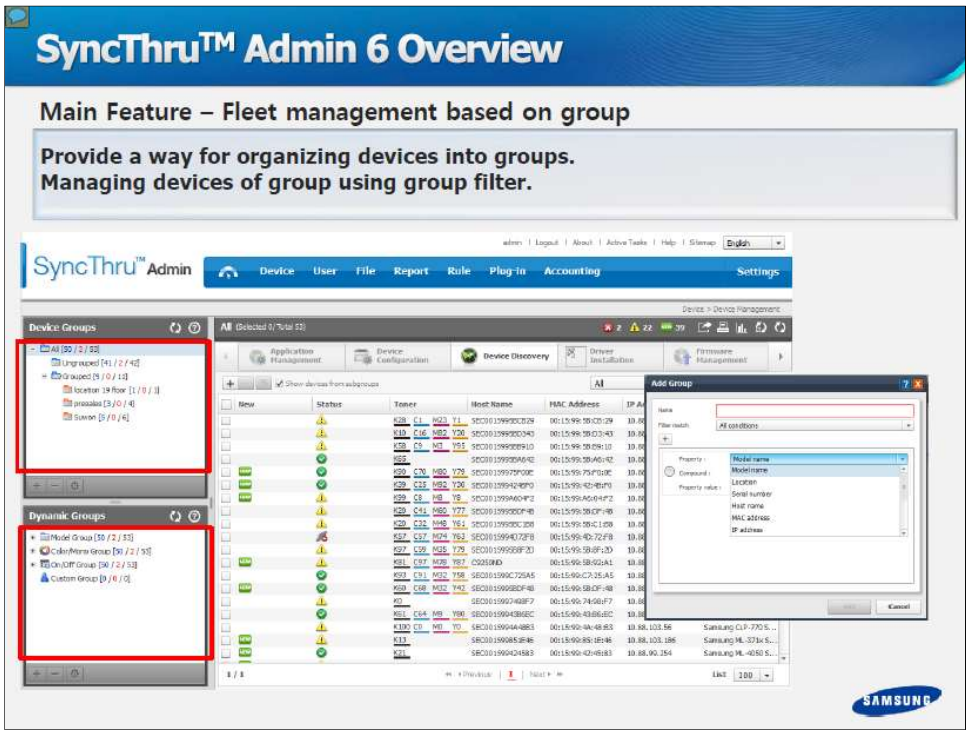
of client applications and respective distributed components;

assessing said health of said plurality of client applications and said respective distributed components; and

associating said health of said plurality of client applications and said respective distributed components as belonging to a single application node.

54. With the SyncThru, Samsung provides a high-level operational support system framework.

Source: **ST2**.



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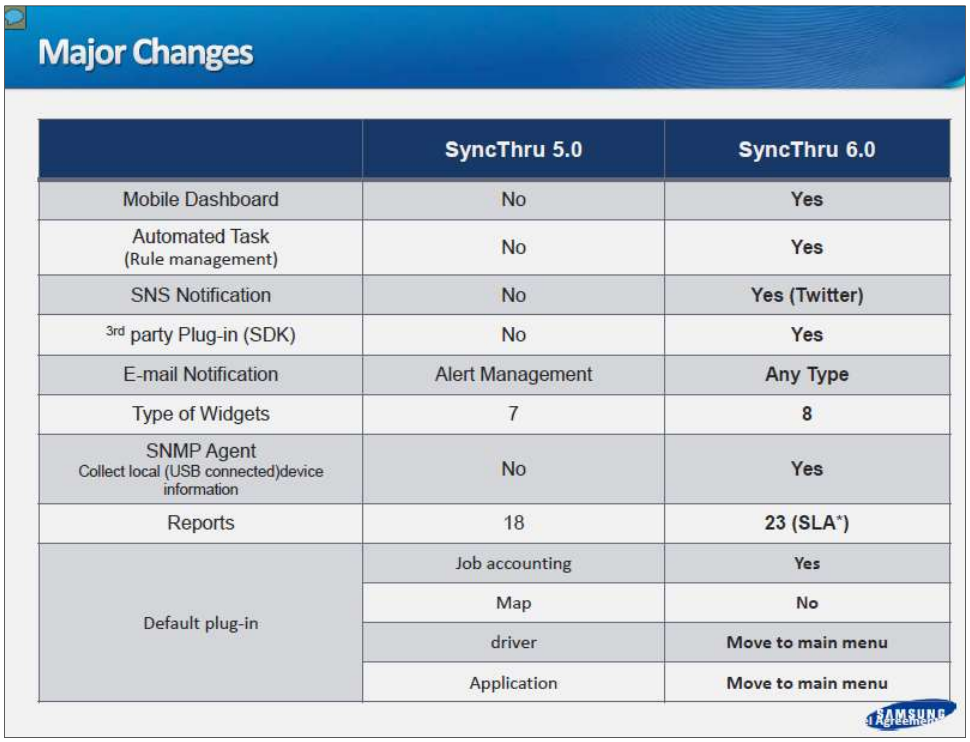
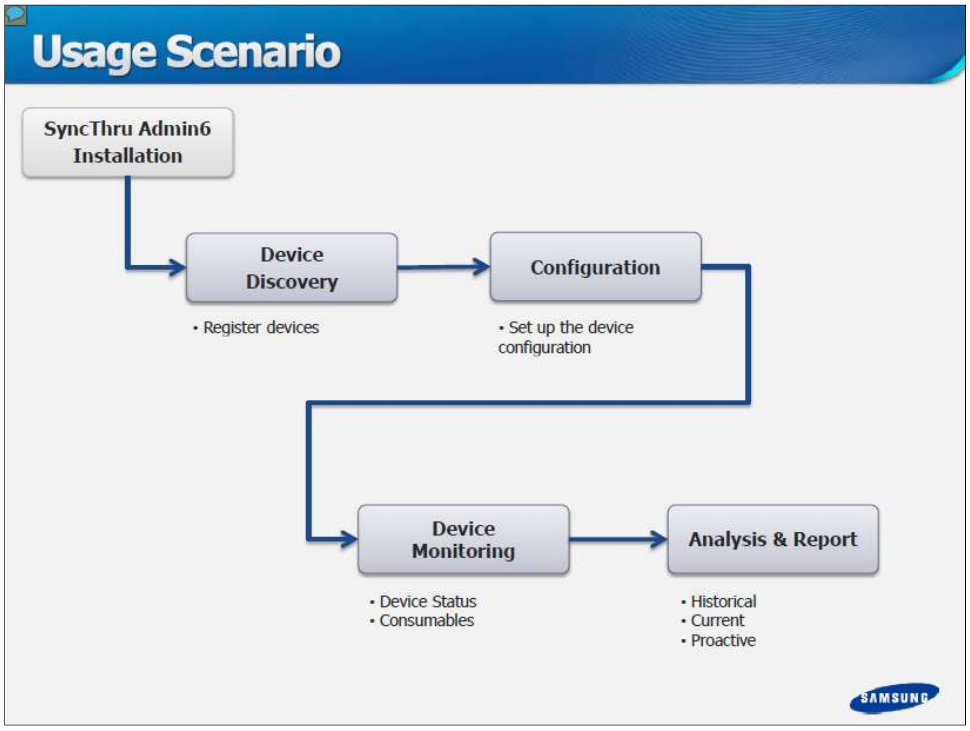


Major Changes

	SyncThru 5.0	SyncThru 6.0
Mobile Dashboard	No	Yes
Automated Task (Rule management)	No	Yes
SNS Notification	No	Yes (Twitter)
3rd party Plug-in (SDK)	No	Yes
E-mail Notification	Alert Management	Any Type
Type of Widgets	7	8
SNMP Agent Collect local (USB connected)device information	No	Yes
Reports	18	23 (SLA*)
Default plug-in	Job accounting	Yes
	Map	No
	driver	Move to main menu
	Application	Move to main menu

Source: **ST2**.



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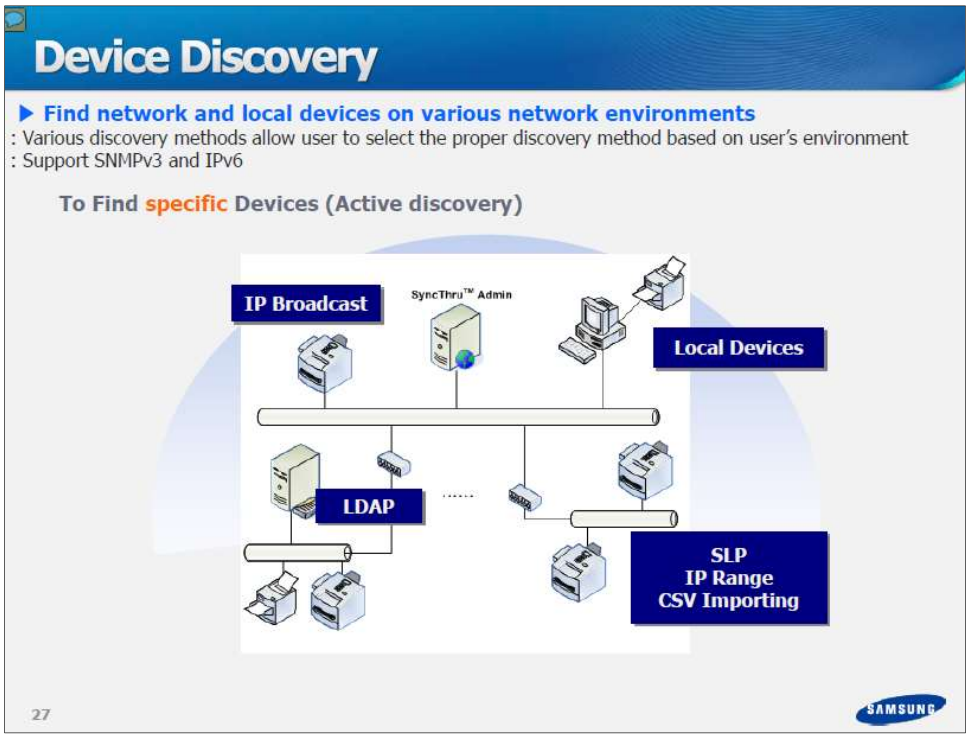

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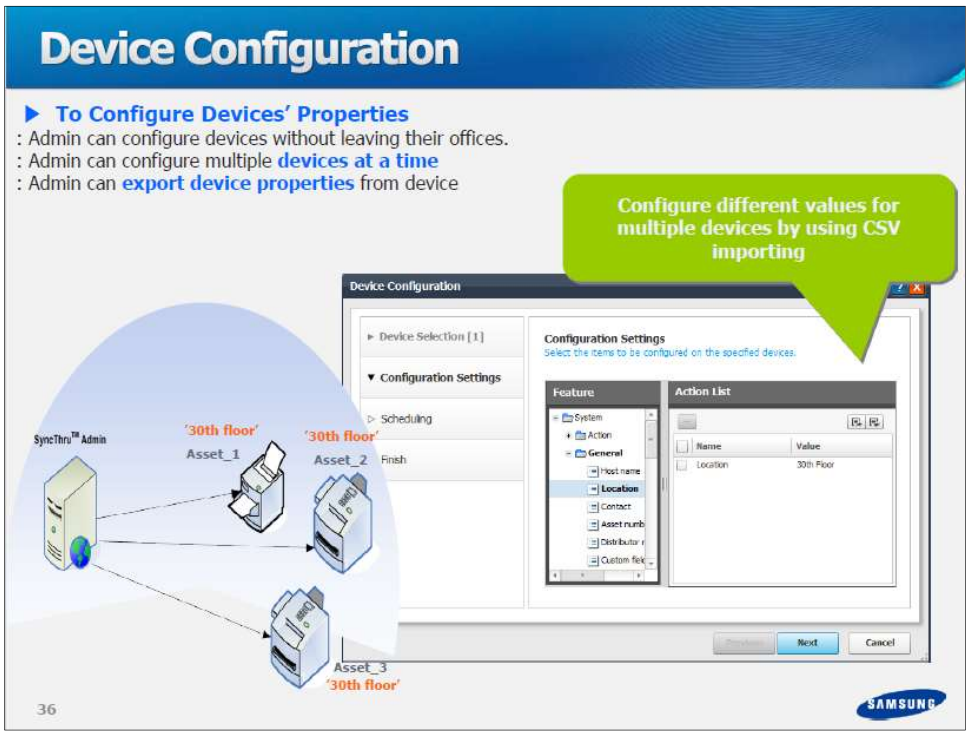

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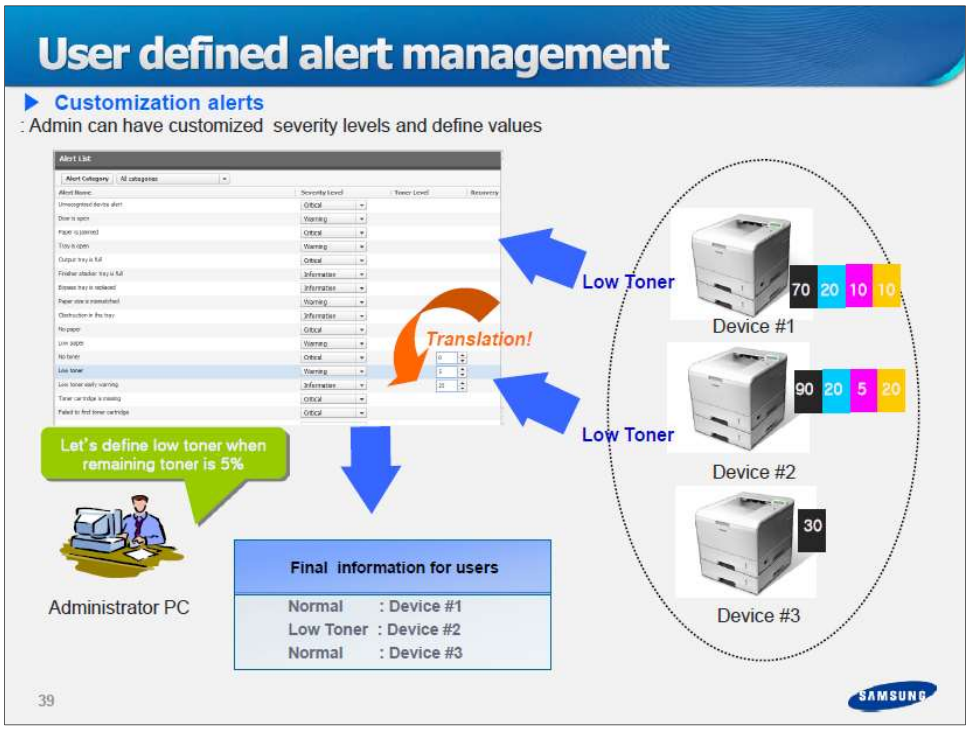

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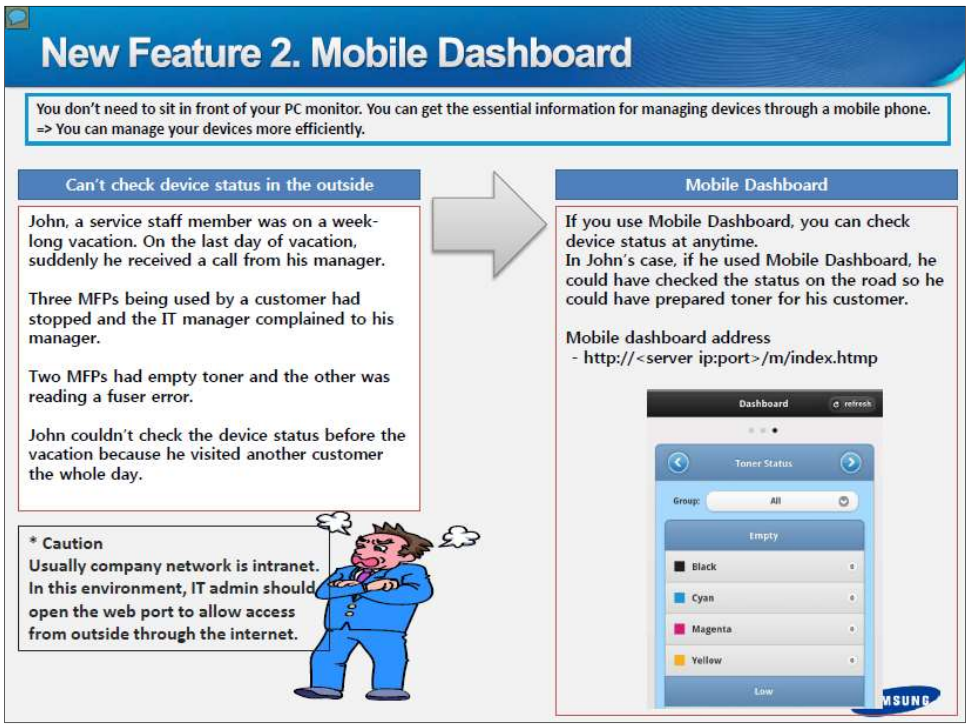


Source: **ST2**.

SAMSUNG SYNCTHRU ADMIN 6

Efficiently manage, monitor and diagnose multiple printing devices remotely with a robust printer fleet management solution
Samsung SyncThru™ Admin 6 is a robust printer fleet management solution that helps organizations increase their efficiency and productivity. This tool is easy to install, and allows IT administrators and support staff to manage, monitor and diagnose multiple printing devices remotely, saving your business time and reducing operational costs. In addition, SyncThru collects summary data on an ongoing basis and can deliver status and analysis reports that can assist a user to ensure their print infrastructure maintains an advanced, professional performance level.

Source: **ST1**.

INTERACTIVE WIDGETS

Interactive Widgets Enable Administrators To Manage Fleets With Greater Ease
The SyncThru Admin 6 PC Dashboard uses visually stunning interactive widgets to help users manage multiple devices across their entire print infrastructure. Up to 5,000 devices can easily be monitored on a single screen. Each widget is displayed as an image, pie chart, table or columns, ensuring that your data is always legible and easy to analyze. In addition, every widget is directly linked to a related report or device list which can be viewed on demand.

Source: **ST1**.

MOBILE DASHBOARD

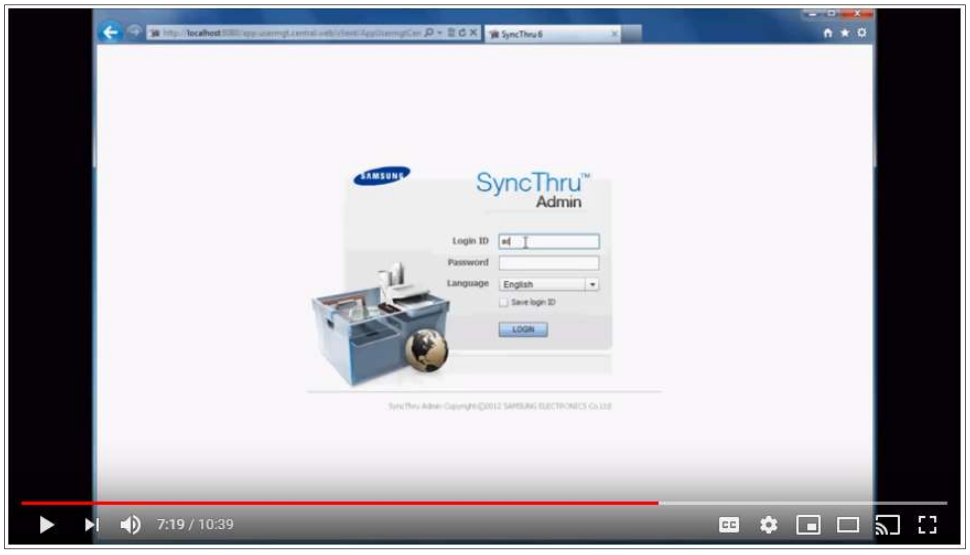
Mobile Dashboard Displays The PC Interface On Your Mobile Device
Users can monitor printers with ease even when away from the office thanks to the Mobile Dashboard. This feature helps increase efficiency and productivity by displaying select PC Dashboard widgets on a wide range of smartphone and tablet devices connected to the company's intranet. With the capability of managing print devices on the move, administrators can respond quicker than ever to events and errors. Real-time SNS notifications are sent to a PC or mobile device alerting administrators to interruptions or print-related issues.

Source: **ST1**.

AUTOMATED TASK MANAGER

Automate Repetitive Tasks Using The Automated Task Manager
The SyncThru Admin 6 Automated Task Manager saves users time by streamlining the processing of recurrent tasks. When devices are added or removed from the fleet, or their state changes or they issue an error message, SyncThru can react automatically by sending a Tweet or e-mail message or applying a pre-defined configuration. This feature simplifies Install, Move, Add, Change and Disposal (IMACD) processes, meaning a new device can be integrated into or withdrawn from the appropriate device group automatically and seamlessly. Rules are simple to set through an automated Wizard process.

Source: **ST1**.



Source: **ST3**.

55. With the SyncThru software product, Samsung monitors health of client applications and health of the distributed components of the client applications using a common monitoring protocol, which is independent of the programming technology of the client applications and distributed components.

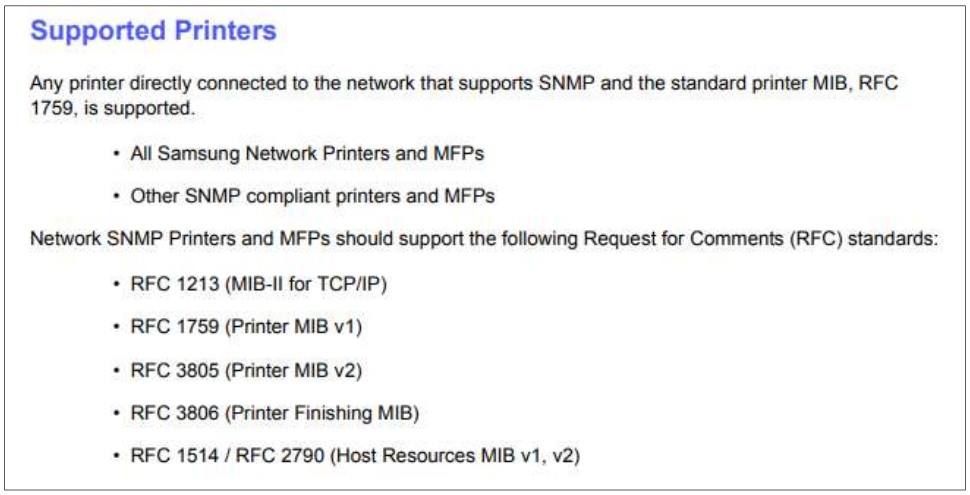
SUPPORTED PRINTERS

The list below is based on the UPD2 Ver.2.50.00.00.

Newer devices(models) will be added accordingly. Visit http://www.samsung.com/printer for the latest supported printers.

Device(Model)		Driver			
Series	Model Number	UPD2	UPD2 PCL6	UPD2 PS	UPD2 XPS
Color Models					
CF-	5100P 530 Series 555P 5800P/6800	O	X	X	X
CLP-	300/310/320 Series	O	X	X	X
	350 Series	O	O	O	O
	360 Series	O	X	X	O
	410 Series	O	O	O	O
	500/510 Series	O	X	X	X
	550 Series	O	O	O	X
	600 Series	O	X	X	X
	610/620 Series	O	O	X	X
	650/660/670 Series	O	O	O	X
	680 Series	O	O	O	O
	770 Series	O	O	O	X
	775 Series	O	O	O	O

Source: **ST4**.



Supported Printers

Any printer directly connected to the network that supports SNMP and the standard printer MIB, RFC 1759, is supported.

- All Samsung Network Printers and MFPs
- Other SNMP compliant printers and MFPs

Network SNMP Printers and MFPs should support the following Request for Comments (RFC) standards:

- RFC 1213 (MIB-II for TCP/IP)
- RFC 1759 (Printer MIB v1)
- RFC 3805 (Printer MIB v2)
- RFC 3806 (Printer Finishing MIB)
- RFC 1514 / RFC 2790 (Host Resources MIB v1, v2)

Source: **ST5**.

Installing the driver locally

A locally connected machine is a machine directly attached to your computer using the cable.

- Only use a USB cable no longer than 3 meters (118 inches).
- **Samsung Printer Experience** app can only be used in the **Start** screen when V4 driver is installed. The V4 driver is automatically downloaded from the Windows Update if your computer is connected to the Internet. If not, you can manually download the V4 driver from Samsung website, www.samsung.com > find your product > Support or downloads.
- If you install the driver using the supplied software CD, V4 driver is not installed. If you want to use the V4 driver in the **Desktop** screen, you can download from the Samsung website, www.samsung.com > find your product > Support or downloads.

Source: **ST6**.

Information tab

This tab gives you general information about your machine. You can check things, such as remaining amount of toner. You can also print reports, such as an error report.

- **Active Alerts:** Shows the alerts that have occurred in the machine and their severity.
- **Supplies:** Shows how many pages are printed and amount of toner left in the cartridge.
- **Usage Counters:** Shows the usage count by print types: simplex and duplex.
- **Current Settings:** Shows the machine's and network's information.
- **Print information:** Prints reports such as system related reports, e-mail address, and font reports.

Source: **ST7**.

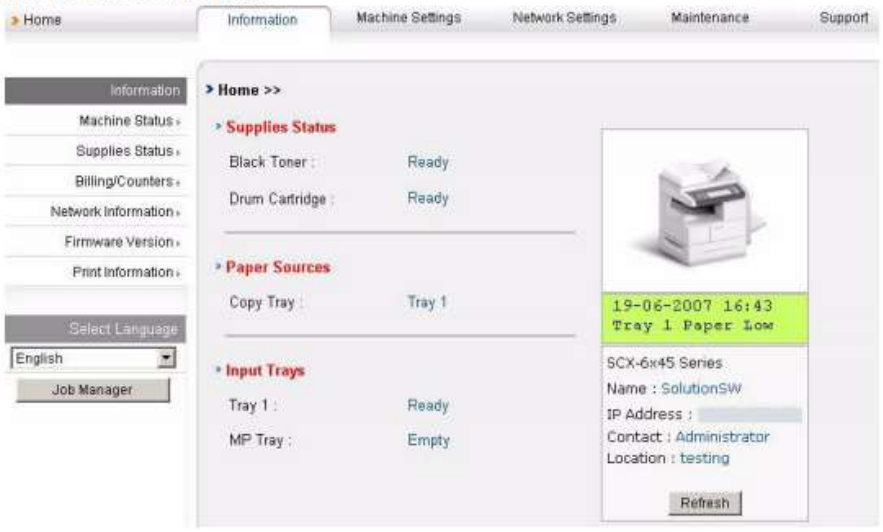
Security tab

This tab allows you to set system and network security information. You need to log-in as an administrator to view this tab.

- **System Security:** Sets the system administrator's information and also enables or disables machine features.
- **Network Security:** Sets settings for HTTPs, IPSec, IPv4/IPv6 filtering, 802.1x, and Authentication servers.
- **User Access Control:** Classifies users into several groups according to each user's role. Each user's authorization, authentication and accounting will be controlled by the group's role definition.

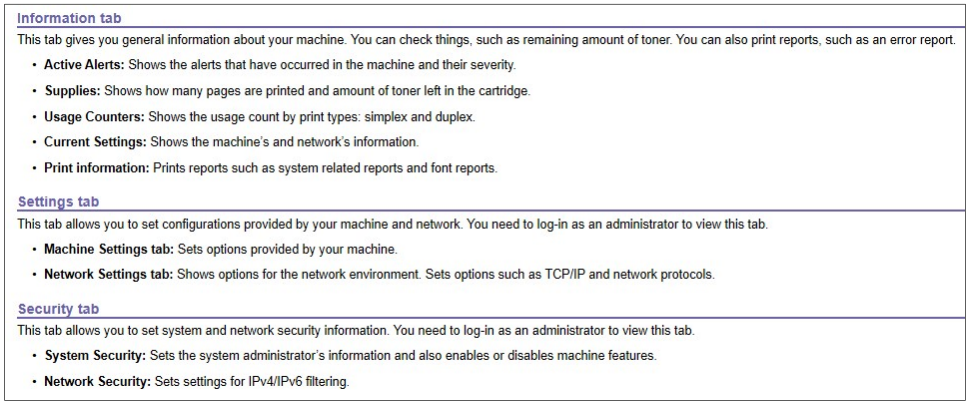
Source: **ST7**.

4. If it is a Samsung device with HDD, you can see the **Job Manager** button at left frame of the embedded web server page.

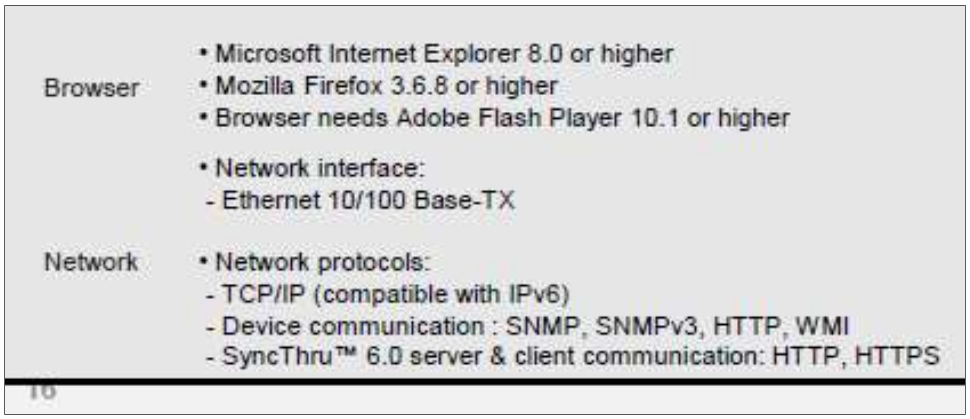


Source: **ST5**.

Source: **ST7**.

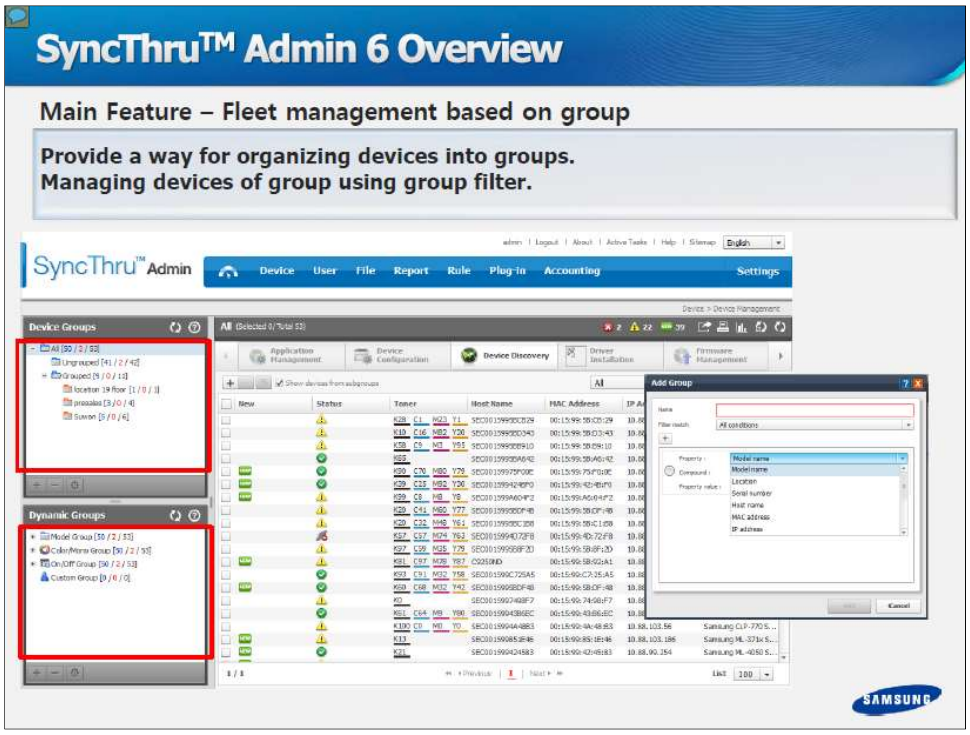


Source: **ST7**.



Source: **ST2**.

56. With the SyncThru software product, Samsung assesses the health of the client applications and distributed components.



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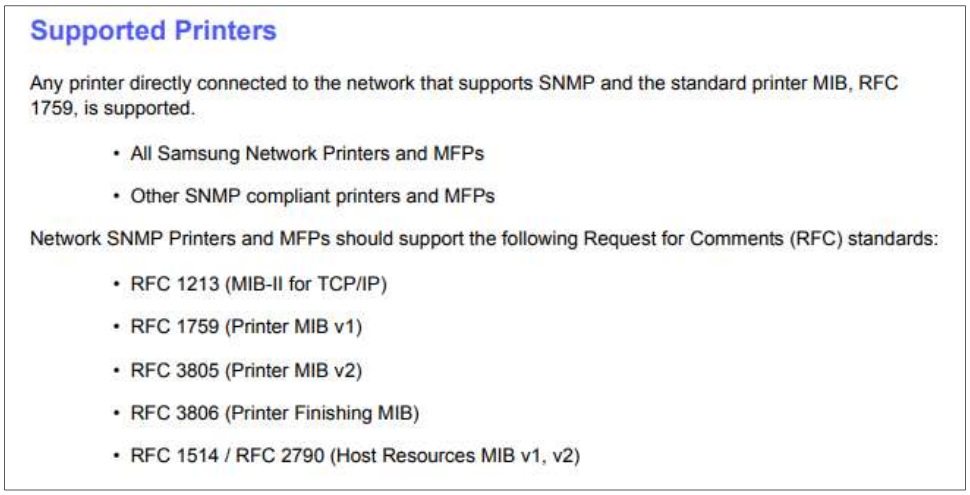
	500/510 Series	O	X	X	X
	550 Series	O	O	O	X
	600 Series	O	X	X	X
	610/620 Series	O	O	X	X
	650/660/670 Series	O	O	O	X
	680 Series	O	O	O	O
	770 Series	O	O	O	X
	775 Series	O	O	O	O

Source: **ST4**.



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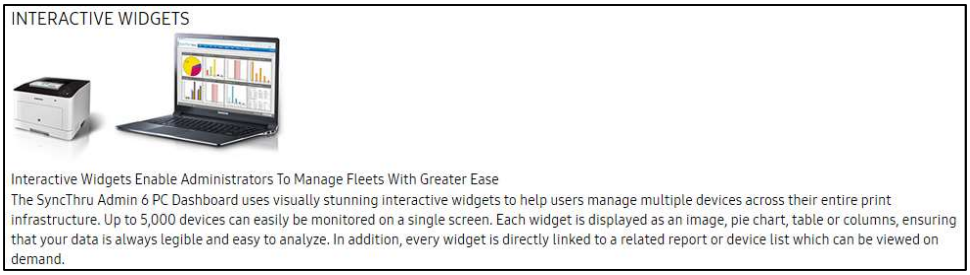
- If you install the driver using the supplied software CD, V4 driver is not installed. If you want to use the V4 driver in the **Desktop** screen, you can download from the Samsung website, www.samsung.com > find your product > Support or downloads.

Source: **ST6**.

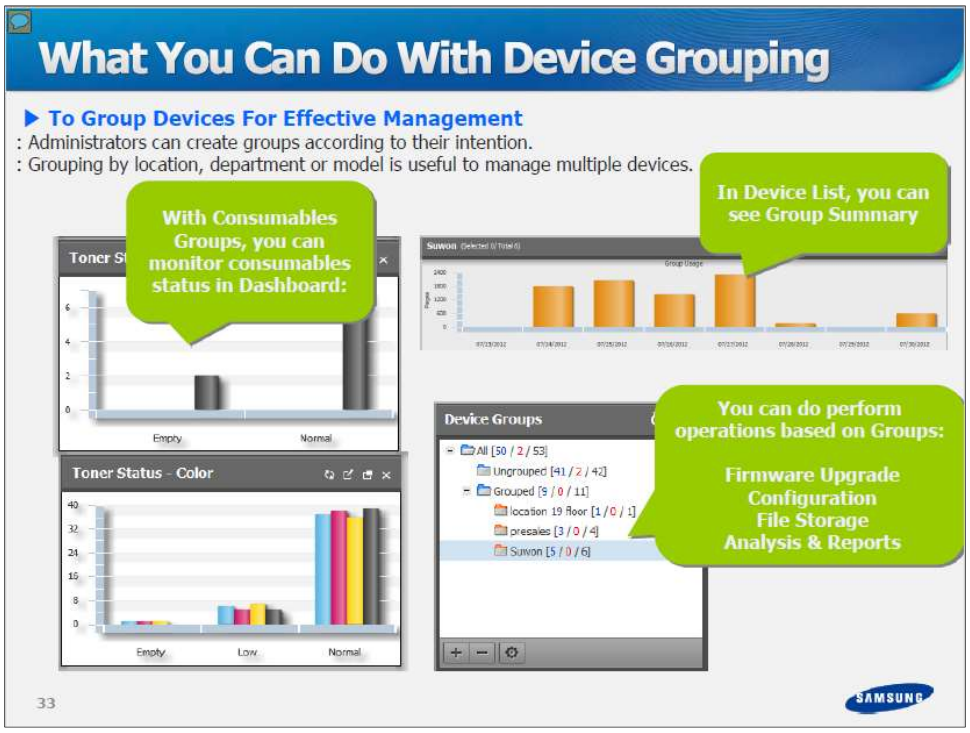


INTERACTIVE WIDGETS

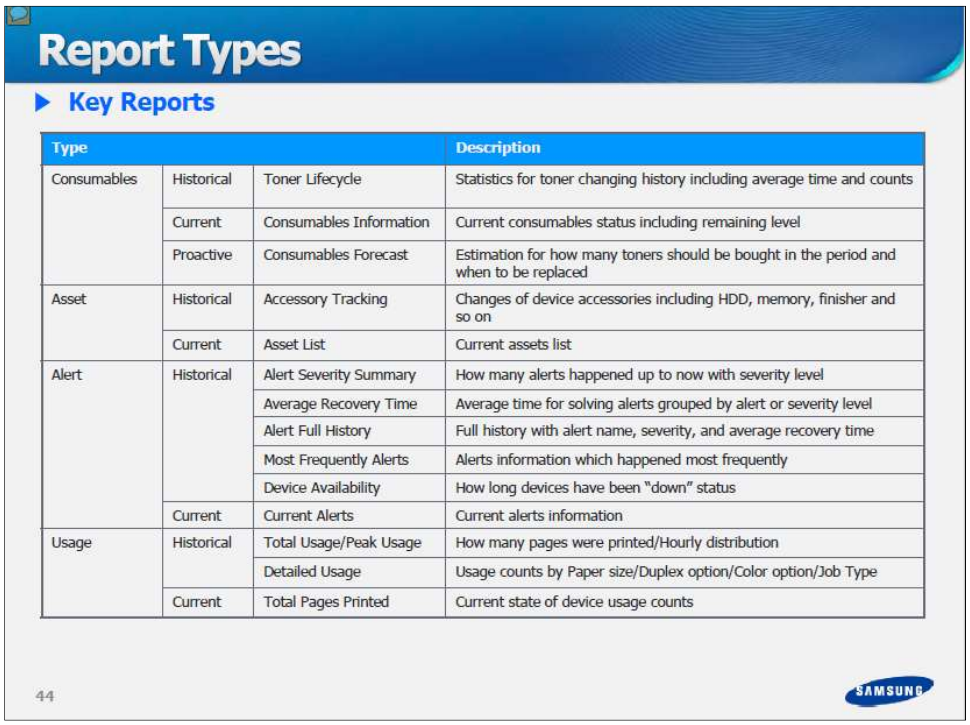
Interactive Widgets Enable Administrators To Manage Fleets With Greater Ease

The SyncThru Admin 6 PC Dashboard uses visually stunning interactive widgets to help users manage multiple devices across their entire print infrastructure. Up to 5,000 devices can easily be monitored on a single screen. Each widget is displayed as an image, pie chart, table or columns, ensuring that your data is always legible and easy to analyze. In addition, every widget is directly linked to a related report or device list which can be viewed on demand.

Source: **ST1**.

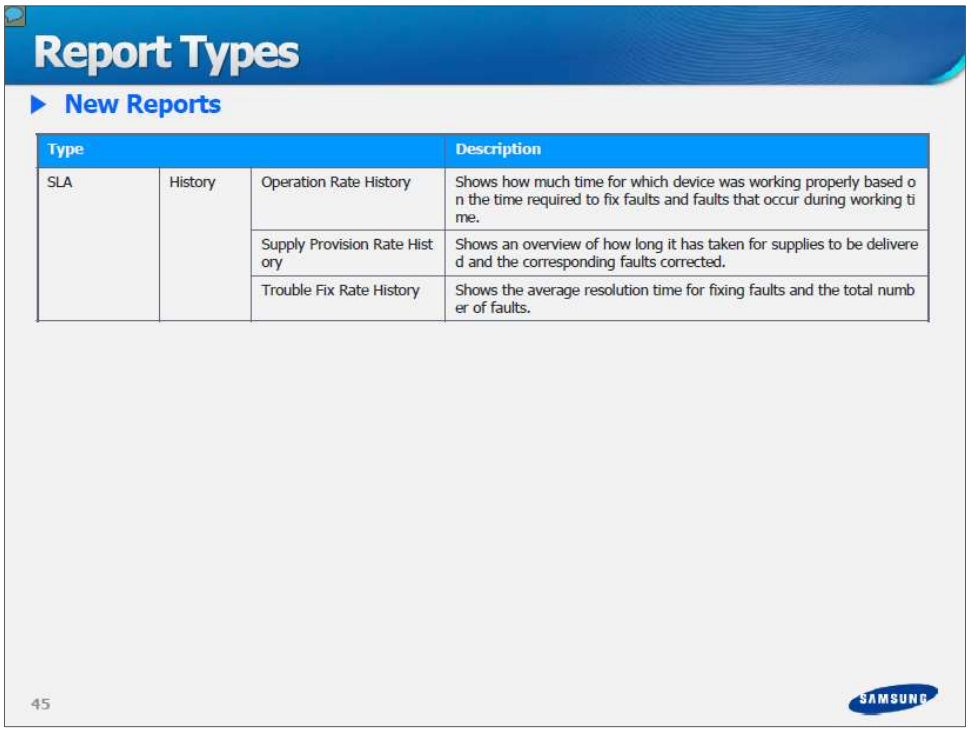


Source: **ST2**.



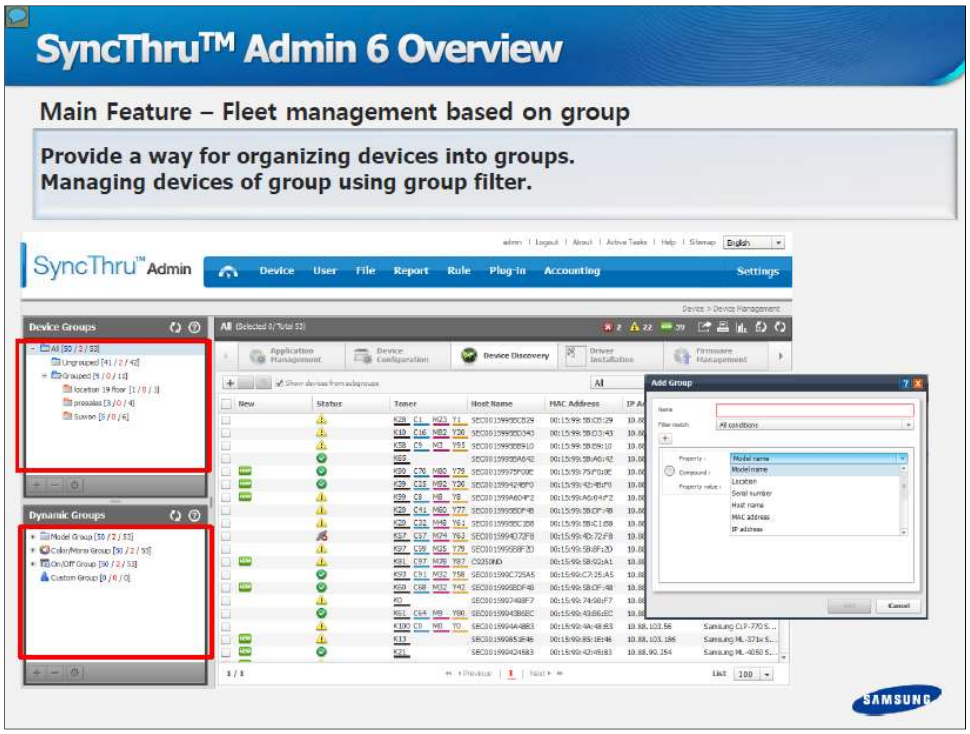
Type			Description
Consumables	Historical	Toner Lifecycle	Statistics for toner changing history including average time and counts
	Current	Consumables Information	Current consumables status including remaining level
	Proactive	Consumables Forecast	Estimation for how many toners should be bought in the period and when to be replaced
Asset	Historical	Accessory Tracking	Changes of device accessories including HDD, memory, finisher and so on
	Current	Asset List	Current assets list
Alert	Historical	Alert Severity Summary	How many alerts happened up to now with severity level
		Average Recovery Time	Average time for solving alerts grouped by alert or severity level
		Alert Full History	Full history with alert name, severity, and average recovery time
		Most Frequently Alerts	Alerts information which happened most frequently
		Device Availability	How long devices have been "down" status
	Current	Current Alerts	Current alerts information
Usage	Historical	Total Usage/Peak Usage	How many pages were printed/Hourly distribution
		Detailed Usage	Usage counts by Paper size/Duplex option/Color option/Job Type
	Current	Total Pages Printed	Current state of device usage counts

Source: **ST2**.



Source: **ST2**.

57. With the SyncThru software product, Samsung associates the health of the client applications and the respective distributed components as belonging to a single application node.



Source: **ST2**.

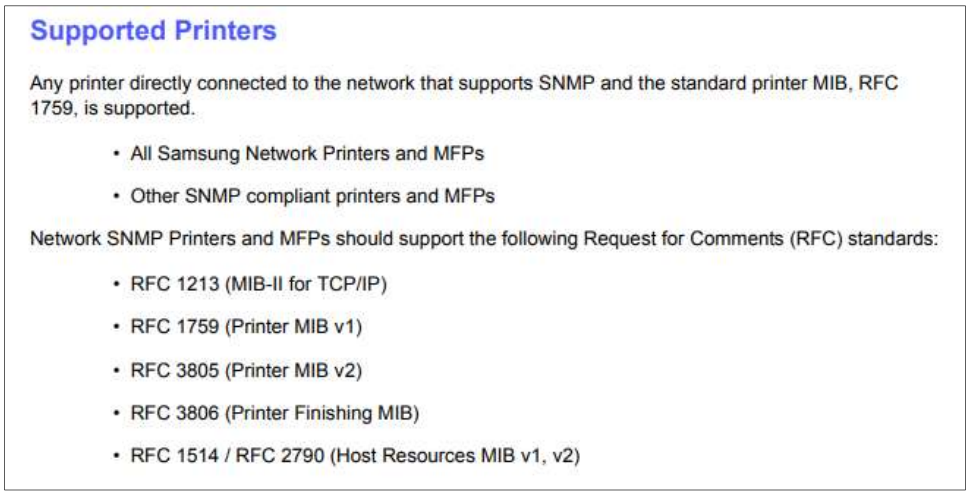
SUPPORTED PRINTERS

The list below is based on the UPD2 Ver.2.50.00.00.

Newer devices(models) will be added accordingly. Visit http://www.samsung.com/printer for the latest supported printers.

Device(Model)		Driver			
Series	**Model Number**	**UPD2**	**UPD2 PCL6**	**UPD2 PS**	**UPD2 XPS**
Color Models					
CF-	5100P 530 Series 555P 5800P/6800	O	X	X	X
CLP-	300/310/320 Series	O	X	X	X
	350 Series	O	O	O	O
	360 Series	O	X	X	O
	410 Series	O	O	O	O
	500/510 Series	O	X	X	X
	550 Series	O	O	O	X
	600 Series	O	X	X	X
	610/620 Series	O	O	X	X
	650/660/670 Series	O	O	O	X
	680 Series	O	O	O	O
	770 Series	O	O	O	X
	775 Series	O	O	O	O

Source: **ST4**.



Supported Printers

Any printer directly connected to the network that supports SNMP and the standard printer MIB, RFC 1759, is supported.

- All Samsung Network Printers and MFPs
- Other SNMP compliant printers and MFPs

Network SNMP Printers and MFPs should support the following Request for Comments (RFC) standards:

- RFC 1213 (MIB-II for TCP/IP)
- RFC 1759 (Printer MIB v1)
- RFC 3805 (Printer MIB v2)
- RFC 3806 (Printer Finishing MIB)
- RFC 1514 / RFC 2790 (Host Resources MIB v1, v2)

Source: **ST5**.

Installing the driver locally

A locally connected machine is a machine directly attached to your computer using the cable.

- Only use a USB cable no longer than 3 meters (118 inches).
- **Samsung Printer Experience** app can only be used in the **Start** screen when V4 driver is installed. The V4 driver is automatically downloaded from the Windows Update if your computer is connected to the Internet. If not, you can manually download the V4 driver from Samsung website, www.samsung.com > find your product > Support or downloads.
- If you install the driver using the supplied software CD, V4 driver is not installed. If you want to use the V4 driver in the **Desktop** screen, you can download from the Samsung website, www.samsung.com > find your product > Support or downloads.

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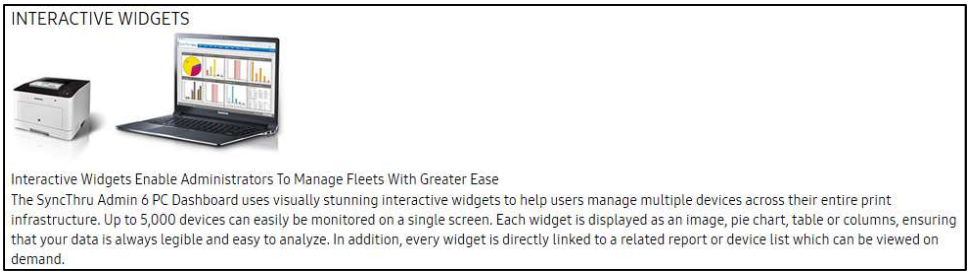

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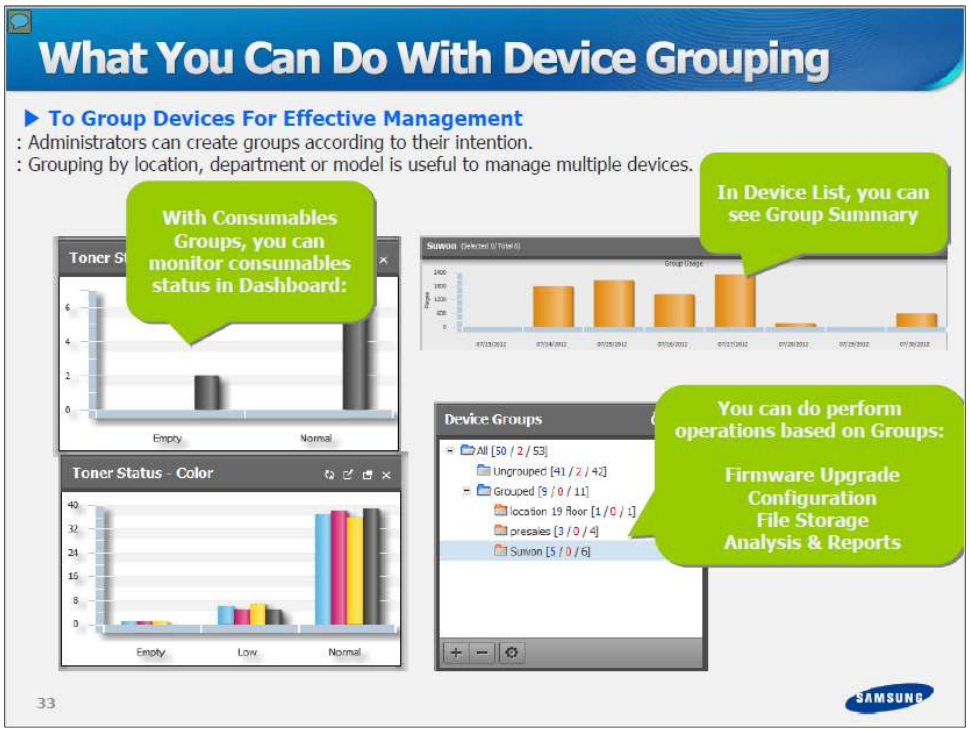
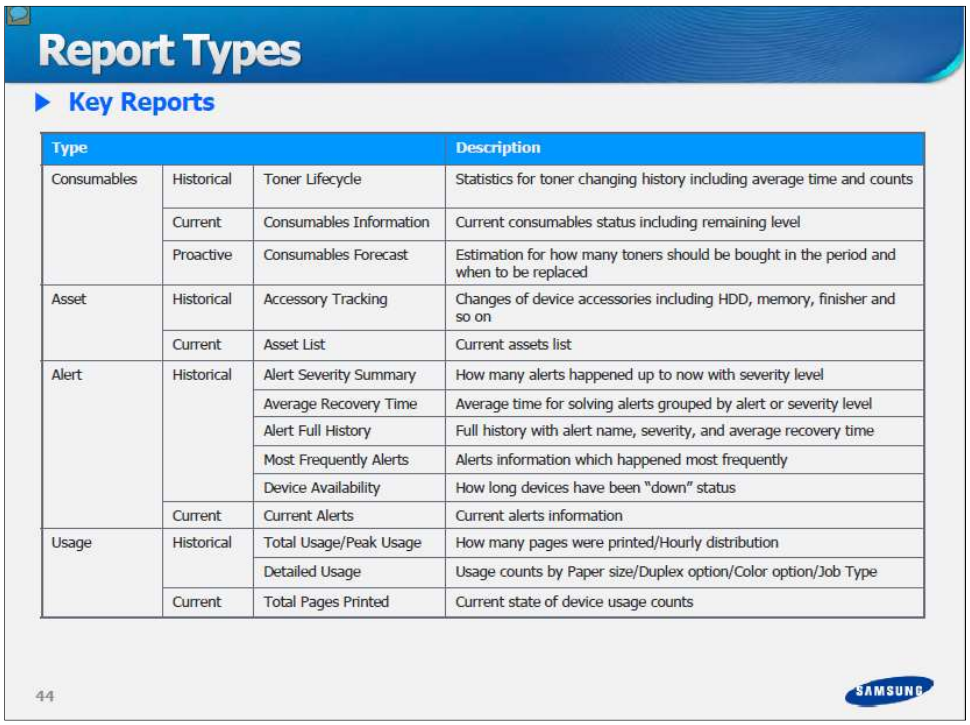


Source: **ST2**.



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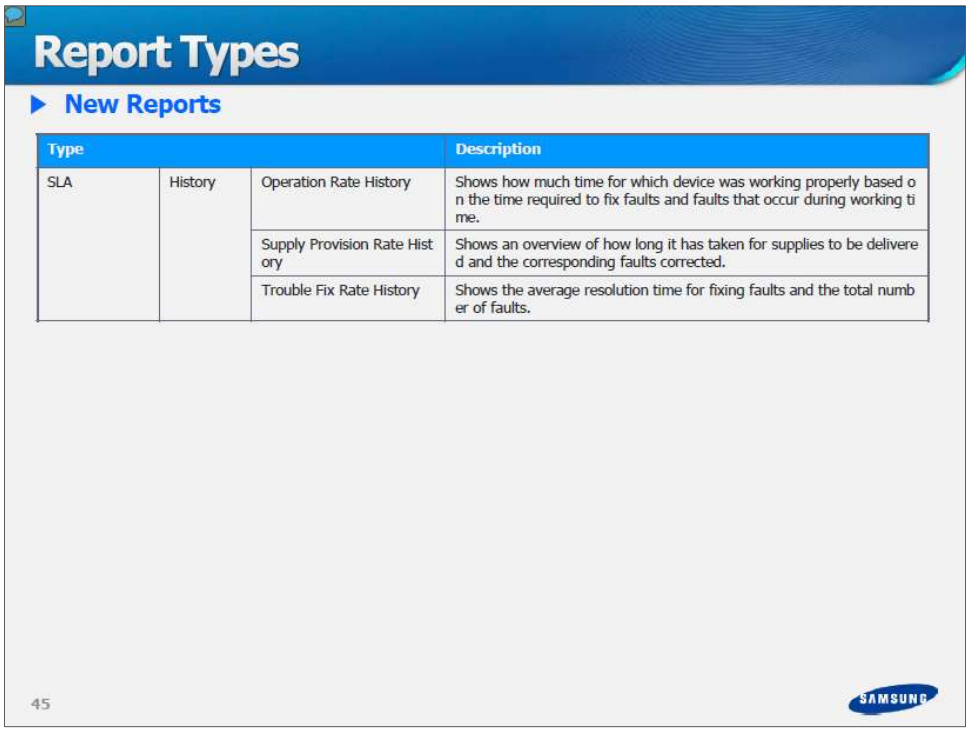

Report Types

New Reports

Type			Description
SLA	History	Operation Rate History	Shows how much time for which device was working properly based on the time required to fix faults and faults that occur during working time.
		Supply Provision Rate History	Shows an overview of how long it has taken for supplies to be delivered and the corresponding faults corrected.
		Trouble Fix Rate History	Shows the average resolution time for fixing faults and the total number of faults.

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SAMSUNG

Source: **ST2**.

58. BCS has been damaged by Samsung's infringement of the '809 Patent.

PRAYER FOR RELIEF

WHEREFORE, BCS respectfully requests the Court enter judgment against Samsung:

1. declaring that the Samsung has infringed the '809 Patent;

2. awarding BCS its damages suffered as a result of Samsung's infringement of the '809 Patent;

3. awarding BCS its costs, attorneys' fees, expenses, and interest; and

4. granting BCS such further relief as the Court finds appropriate.

JURY DEMAND

BCS demands trial by jury, Under Fed. R. Civ. P. 38.

Dated: April 1, 2019

Respectfully Submitted

/s/ Raymond W. Mort, III

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ATTORNEYS FOR PLAINTIFF